

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In Re: : Case No. 19-51176

Michele P. Meyer : Chapter 13

Debtor. : Judge Khorrami

DEBTOR'S MOTION TO MODIFY PLAN POST-CONFIRMATION

Debtor moves this Court to modify her Chapter 13 Plan. In support of this motion she states:

1. The Chapter 13 Plan, confirmed on May 16, 2019, presently calls for her to pay \$6,600.00 per month. An 87% dividend will be paid to the general unsecured creditors.
2. Debtor has experienced an increase in income.
3. The modification proposed by Debtor will positively modify the rights of unsecured creditors in that the percentage of payment will increase to 100%.
4. A proposed modified Plan is attached below and a copy of the same, together with a copy of this motion, has been sent to the Chapter 13 Trustee, U.S. Trustee, and to the holders of all claims.

WHEREFORE, Debtor prays she be permitted to modify the Plan to conform to the below-attached modified Plan pursuant to 11 U.S.C. Sec. 1329.

Dated: 10/26/2021

/s/ Scott R. Needleman

Scott R. Needleman (0055533)
The Needleman Law Office, LLC
5300 E. Main Street, STE 109
Columbus, OH 43213
(614) 575-1188
(614) 575-1186 (fax)
j.ives@srneedleman.com

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In Re: : Case No. 19-51176
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MODIFICATION TO CONFIRMED CHAPTER 13 PLAN

Now comes the Debtors to modify the Plan to state:

Debtors monthly plan payment of \$6,600 shall be temporarily suspended for six (6) months starting April 2021. Beginning October 2021, Debtor's plan payment of \$9,950.00 per month shall resume for the remainder of the plan. The unsecured dividend will increase to 100%.

Dated: 10/26/2021

/s/ Scott R. Needlman
The Needleman Law Office, LLC
Attorney for Debtor

Debtor's Verification

I declare under penalty of perjury that I have read the attached modification and that it is true and correct to the best of my knowledge, information, or belief.

Dated: 10/26/2021

/s/ Michele P. Meyer

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In Re: : Case No. 19-51176

Michele P. Meyer : Chapter 13

Debtor. : Judge Khorraman

NOTICE AND CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing attached Amended Motion was served by Ordinary U.S. Mail this date on the parties whose names and full addresses are listed below as and for **NOTICE** that the attached Motion has been filed. The undersigned will present to the Court a proposed Order granting the Motion sought unless within twenty-one (21) days after this date a written Memorandum in Opposition, along with a Request for a Hearing on such opposition, is filed with the Clerk of Court, 170 N. High Street, Columbus, Ohio and served on the undersigned.

Dated: 10/26/2021

/s/ Scott R. Needleman

Scott R. Needleman (0055533)
The Needleman Law Office, LLC
5300 E. Main Street, STE 109
Columbus, OH 43213
(614) 575-1188
(614) 575-1186 (fax)
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SERVED:

Asst US Trustee (Col)
Office of the US Trustee
170 North High Street
Suite 200
Columbus, OH 43215
614-469-7411
ustpregion09.cb.ecf@usdoj.gov

Edward A. Bailey
Chapter 13 Trustee
130 E. Wilson Bridge Road
Suite 200
Worthington, OH 43085
(614) 436-6700
trustee@ch13.org

Debtor:

Michele P Meyer
222 Honey Locust Lane
Commercial Point, OH 43116

Creditors:

2:19-bk-51176|KEMBA Financial Credit Union, Inc | ||||undeliverable
2:19-bk-51176|LVNV Funding LLC |c/o Resurgent Capital Services|PO Box 10587|Greenville,
SC 29603-0587 |||
2:19-bk-51176|MidFirst Bank | ||||undeliverable

MidFirst Bank
Adam Bradley Hall
Manley Deas Kochalski
P.O. Box 165028
Columbus, OH 43216-5028
614-220-5611
amps@manleydeas.com

2:19-bk-51176|Ohio Department of Taxation | ||||undeliverable
Ohio Department of Taxation
Brian M Gianangeli
6305 Emerald Parkway
Dublin, OH 43016
(614) 224-8313
(614) 224-9986 (fax)
bgianangeli@mifsudlaw.com

2:19-bk-51176|Synchrony Bank |c/o PRA Receivables Management, LLC|PO Box
41021|Norfolk, VA 23541-1021|||
2:19-bk-51176|Wells Fargo Bank, N.A. | ||||undeliverable

Wells Fargo Bank, N.A.
Richard John LaCivita
Reimer Law Co
30455 Solon Rd
Solon, OH 44139
440-600-5500
bknoticesouth@reimerlaw.com

2:19-bk-51176|ACAR Leasing Ltd |GM Financial Leasing|PO Box 183853|Arlington, TX
76096-3853| |||
2:19-bk-51176|Anytime Fitness |3050 Turnberry Court|Grove City, OH 43123| |||
2:19-bk-51176|Asst US Trustee (Col) |Office of the US Trustee|170 North High Street|Suite
200|Columbus, OH 43215-2417|||
2:19-bk-51176|OHIO ATTORNEY GENERAL'S OFFICE|ATTN ATTN BANKRUPTCY
UNIT COLLECTIONS ENFORCEMENT|30 E BROAD ST|14TH
FLOOR|COLUMBUS OH 43215-3414||preferred

Attorney General Rev Rec
Attn: Bankruptcy Staff
150 E. Gay St. 21st Floor
Columbus, OH 43215

2:19-bk-51176|Capital One (p) |PO Box 30285|Salt Lake City, UT 84130-0285| |||
2:19-bk-51176|Citi Cards/Costco |PO Box 6077|Sioux Falls, SD 57117-6077| |||
2:19-bk-51176|Comenity Bank/Buckle |PO Box 182125|Columbus, OH 43218-2125| |||
2:19-bk-51176|Comenity Bank/Victoria Secret |2795 E Cottonwood Parkway|Suite 100|Salt
Lake City, UT 84121-7090| |||
2:19-bk-51176|Department Stores National Bank |c/o Quantum3 Group LLC|PO Box
657|Kirkland, WA 98083-0657| |||
2:19-bk-51176|Discover Bank |Discover Products Inc|PO Box 3025|New Albany OH
430543025| |||
2:19-bk-51176|Discover Financial Services (p) |PO Box 3025|New Albany, OH 43054-3025| |||
2:19-bk-51176|EAGLE LOAN COMPANY |2467 HILLIARD ROME RD|HILLIARD, OH
43026-8194| |||
2:19-bk-51176|Eagle Loan Company of Ohio (p) |2471 Hilliard Rome Road|Hilliard, OH 43026-
8194| |||
2:19-bk-51176|Elan Financial (p) |Attn: Bankruptcy|PO Box 5229|Cincinnati, OH 45201-5229| |||
2:19-bk-51176|First National Bank of Omaha/Blaze |PO Box 3773|Omaha, NE 68103-0773| |||
2:19-bk-51176|Home Depot Credit Services (p) |PO Box 790328|Saint Louis, MO 63179-0328|
|||
2:19-bk-51176|Internal Revenue Service (p) |Centralized Insolvency Operations|PO Box
7346|Philadelphia, PA 19101-7346| |||

2:19-bk-51176|JP Recovery Services (p) |20220 Center Ridge Road|Rocky River, OH 44116-3501| |||

2:19-bk-51176|Kemba Columbus Credit Union |555 Office Center Place|Gahanna, OH 43230-5314| |||

2:19-bk-51176|LVNV Funding LLC |c/o Resurgent Capital Services|PO Box 10587|Greenville, SC 29603-0587| ||duplicate

2:19-bk-51176|LVNV Funding, LLC |Resurgent Capital Services|PO Box 10587|Greenville, SC 29603-0587| ||

2:19-bk-51176|Lending Club (p) |71 Stevenson Street|Suite 300|San Francisco, CA 94105-2985| |||

2:19-bk-51176|LendingClub Corporation |595 Market Street, Suite 200|Attn Bankruptcy Dept|San Francisco, CA 94105-2807| ||

2:19-bk-51176|Macy's (p) |Bankruptcy Processing|PO Box 8053|Mason, OH 45040-8053| ||

2:19-bk-51176|MidFirst Bank |c/o Manley Deas Kochalski LLC|P.O. Box 165028|Columbus, OH 43216-5028| ||

2:19-bk-51176|Midland Mortgage |PO Box 26648|Oklahoma City, OK 73126-0648| |||

2:19-bk-51176|Ohio Department of Taxation |Bankruptcy Division|P.O. Box 530|Columbus, OH 43216-0530| ||

2:19-bk-51176|Ohio Dept. of Taxation(p) |ATTN: Bankruptcy Division|PO Box 530|Columbus, OH 43216-0530| ||

2:19-bk-51176|Ohio Health (p) |5350 Frantz Road|Dublin, OH 43016-4259| |||

2:19-bk-51176|PRA Receivables Management, LLC |PO Box 41021|Norfolk, VA 23541-1021| |||

2:19-bk-51176|PORTFOLIO RECOVERY ASSOCIATES LLC|PO BOX 41067|NORFOLK VA 23541-1067| ||||preferred

2:19-bk-51176|Quantum3 Group LLC as agent for |Comenity Bank|PO Box 788|Kirkland, WA 98083-0788| ||

2:19-bk-51176|RITA (p) |ATTN: LEGAL DEPT.|PO Box 470537|Broadview Hts, OH 44147-0537| ||

2:19-bk-51176|Sherloq Financial |134 South Tampa Street|Tampa, FL 33602-5354| |||

2:19-bk-51176|Synchrony Bank |Attn: Bankruptcy|332 Minnesota Street W600|Saint Paul, MN 55101-1535| ||

2:19-bk-51176|Synchrony Bank/Care Credit (p) |Attn: Bankruptcy Dept|PO Box 965061|Orlando, FL 32896-5061| ||

2:19-bk-51176|Synchrony Bank/Dicks |Attn: Bankruptcy|PO Box 965005|Orlando, FL 32896-5005| ||

2:19-bk-51176|Telhio Credit Union (p) |96 N. Fourth Street|Columbus, OH 43215-3163| |||

2:19-bk-51176|U.S. Bank NA dba Elan Financial Services |Bankruptcy Department|PO Box 108|St. Louis MO 63166-0108| ||

2:19-bk-51176|US Attorney General |Main Justice Bldge, Rd 5111|10 th Constitution Ave NW|Washington, DC 20530-0001| ||

2:19-bk-51176|US District Attorney |303 Marconi, 2nd Floor|Columbus, OH 43215-2839| |||

2:19-bk-51176|Vital Recovery Services Inc. |PO Box 923747|Norcross, GA 30010-3747| |||

2:19-bk-51176|Wells Fargo NA as |Collateral Agent|PO Box 9000|Lutherville Timonium, MD 21094-9000| ||

2:19-bk-51176|William C Rogers |2719 Pineview Drive|Ft Mitchell, KY 41017-1044| |||

2:19-bk-51176|Wright Pat Credit Union (p) |3560 Pentagon Blvd|Dayton, OH 45431-1706| |||

2:19-bk-51176|WRIGHT PATT CREDIT UNION|3560 PENTAGON BLVD|BEAVERCREEK
OH 45431-1706|||preferred